

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

---

In re:

Chapter 7  
Bky. No. 24-30167

Pro-Mark Services, Inc.,

Debtor,

---

Erik A. Ahlgren, as Chapter 7 Trustee  
of Bankruptcy Estate of Pro-Mark Services, Inc.,  
and as Administrator of the Pro-Mark Services,  
Inc. Employee Stock Ownership Plan,

Adv. No. 24-07014

Plaintiff,

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

v.

Connie Berg, Kyle Berg, Connie Berg  
Revocable Living Trust, Kyle R. Berg  
Revocable Living Trust, Chad DuBois,  
Mandy Grant, and Miguel Paredes,

Defendants.

---

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b), Brian D. Larson and Andrew D. Cook of Ohnstad Twichell, P.C., hereby enter their appearance as counsel in this matter on behalf of Defendant Mandy Grant, and requests that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the contact information below:

Brian D. Larson  
Andrew D. Cook  
OHNSTAD TWICHELL, P.C.  
444 Sheyenne Street, Suite 102  
West Fargo, ND 58078-0458  
Tel: (701) 282-3249  
Email: blarson@ohnstadlaw.com  
Email: acook@ohnstadlaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and all proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive any defenses or rights that may be asserted in this matter, including a challenge to subject matter and personal jurisdiction to hear this case.

Dated: September 25, 2024.

Respectfully submitted,

*/s/ Andrew D. Cook*

---

Brian D. Larson, ND ID #08568

Andrew D. Cook, ND ID # 06278

OHNSTAD TWICHELL, P.C.

444 Sheyenne Street, Suite 102

P.O. Box 458

West Fargo, ND 58078-0458

Tel: (701) 282-3249

Fax: (701) 282-0825

Email: blarson@ohnstadlaw.com

Email: acook@ohnstadlaw.com

*Counsel for Defendant Mandy Grant*